

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902M) for Approval of its Energy Storage Procurement Framework and Program As Required by Decision 13-10-040.	Application 14-02-006 (Filed February 28, 2014)
And Related Matters.	Application 14-02-007 Application 14-02-009

**DECISION AWARDING COMPENSATION TO
THE UTILITY REFORM NETWORK FOR SUBSTANTIAL
CONTRIBUTION TO DECISION 14-10-045**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 14-10-045
Claimed: \$31,591.72	Awarded: \$30,532.92 (reduced 3.35%)
Assigned Commissioner: Carla Peterman	Assigned ALJ: Colette Kersten

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.14-10-045, <i>Decision Approving San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company's Storage Procurement Framework and Program Applications for the 2014 Biennial Procurement Period</i> , the Commission approved the utilities' applications for the 2014-2016 Biennial Procurement Period with modifications related to the definition of eligible technologies, cost allocation and recovery issues, the use of the Consistent Evaluation Protocol, and details related to form, content, and timing of the 2014 solicitations and utility requests for Commission approval of resulting contracts.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	May 14, 2014	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	June 13, 2014	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.12-11-009	Verified
6. Date of ALJ ruling:	Sept. 6, 2013	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009	Verified
10. Date of ALJ ruling:	Sept. 6, 2013	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-10-045	Verified
14. Date of issuance of Final Order or Decision:	Oct. 22, 2014	Verified
15. File date of compensation request:	Dec. 15, 2014	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<u>Approval of the Utilities’ Proposed Storage Procurement Plans for the 2014 Solicitation (Scoping Memo Issue 1)</u> TURN contributed to the Commission’s determination that	<ul style="list-style-type: none"> D.14-10-045 at p. 20. TURN Response to Scoping Memo Questions at p. 12; see also pp. 3-4. 	Yes, but duplicative of other parties that also recommended to reject PG&E’s request. TURN did not add comments

it should reject PG&E's request to count its existing 2.5 MW dairy biogas projects as an offset to its 2014 energy storage procurement targets.		that contributed substantially more than other parties on this issue.
<p><u>The Definition of "Energy Storage" for the Storage Procurement Program</u> (<i>Scoping Memo Issue 6</i>)</p> <p>TURN demonstrated that the Commission has ample discretion to determine which technologies should be eligible for the energy storage procurement program.</p>	<ul style="list-style-type: none"> • D.14-10-045 at p. 60 ("As a general matter regarding discretion to determine eligibility for the storage procurement program, we agree with TURN that the Commission has the discretion to limit or exclude a particular technology, 'even if one could theoretically argue that the statutory definition of energy storage could accommodate' that technology. For example, D.13-10-040 limits the size of pumped storage projects that are eligible to participate in the Storage Framework.'") • TURN Response to Scoping Memo Questions at p. 3. 	Yes.
<p><u>The Definition of "Energy Storage" for the Storage Procurement Program</u> (<i>Scoping Memo Issue 6</i>)</p> <p>TURN, along with other parties, contributed to the Commission's rejection of PG&E's theory that that the "natural gas pipeline" qualifies as the storage component of its existing dairy biogas projects.</p>	<ul style="list-style-type: none"> • D.14-10-045 at p. 62 (presenting conclusion) and p. 57 (discussing TURN's opposition to PG&E's position). • TURN Response to Scoping Memo Questions, at pp. 3-4, 12. 	Yes.
<p><u>The Definition of "Energy Storage" for the Storage Procurement Program</u> (<i>Scoping Memo Issue 6</i>)</p> <p>TURN demonstrated that the</p>	<ul style="list-style-type: none"> • D.14-10-045 at pp. 63-64 ("[W]e agree with TURN that 'the mere listing of [a use case] in Table 1 in D.13-10-040 as a 'Use-Case Example' is not dispositive of the broader issue 	Yes.

<p>listing of a technology as a “use case” in Table 1 in D.13-10-040 was not dispositive of whether that use case should qualify for the upcoming storage solicitation. TURN applied this analysis to a different “use case” than that at issue in the Commission’s holding, but the Commission nonetheless embraced TURN’s position as the correct interpretation of D.13-10-040.</p>	<p>of whether the Commission should now determine that [use case] should qualify for the upcoming storage solicitation.”).</p> <ul style="list-style-type: none"> • TURN Reply to Scoping Memo Questions at pp. 6-7 (quoted by D.14-10-045). 	
<p><u>Deadlines for Submitting Contracts Resulting from the 2014 Storage RFO to the Commission and for Requesting Deferment of Storage Targets</u> (<i>Scoping Memo Issue 4</i>)</p> <p>TURN contributed to the Commission’s determination that the deadline for requesting deferment of storage targets should be extended from three months after the utilities receive bids until the time they submit winning projects for approval.</p>	<ul style="list-style-type: none"> • D.14-10-045 at p. 78. • TURN Response to Scoping Memo Questions at p. 13 (discussed in D.14-10-045 at pp. 76-77). 	<p>Yes, but duplicative of other parties arguments, and generally simply supportive of the argument of that of the three utilities.</p>
<p><u>Deadlines for Submitting Contracts Resulting from the 2014 Storage RFO to the Commission and for Requesting Deferment of Storage Targets</u> (<i>Scoping Memo Issue 4</i>)</p> <p>TURN demonstrated that it was premature to modify the existing schedule for executing and submitting contracts, established in D.13-10-040 as one year from the date of the solicitation, but also that the IOUs should be permitted to request an extension in the future due to legitimate</p>	<ul style="list-style-type: none"> • D.14-10-045 at p. 92 (agreeing with TURN’s approach to the utilities’ request for a schedule extension, and not entertaining proposals to expedite the schedule, summarized on p. 91). • TURN Response to Scoping Memo Questions at p. 7 (addressing the utilities’ requests for more time). • TURN Reply to Scoping Memo Questions at pp. 4, 5 (addressing the Joint LDES 	<p>Yes.</p>

<p>needs. TURN likewise successfully argued that other parties' calls for expedited procurement should be dismissed.</p>	<p>Parties' claim of urgency).</p>	
<p><u>Procedural Vehicle for Project Approval</u> (<i>Scoping Memo Issue 5</i>)</p> <p>TURN, along with other parties, demonstrated that the utilities should submit applications rather than Tier 3 Advice Letters for approval of the projects resulting from the 2014 storage solicitations, but that the Advice Letter process might be appropriate for future solicitations.</p>	<ul style="list-style-type: none"> • D.14-10-045 at pp. 102-103 (relying on TURN's showing, as well as that of Sierra Club and ORA). • TURN Response to Scoping Memo Questions at pp. 9-11. • TURN Reply to Scoping Memo Questions at p. 6 (rebutting the arguments of PG&E and SCE in support of the Advice Letter process). 	<p>Yes. Although TURN was duplicative in its support for applications over advice letters, TURN's contribution was distinct.</p>
<p><u>Cost Recovery for Energy Storage Procurement</u> (<i>Scoping Memo Issue 2</i>)</p> <p>TURN contributed to the Commission's conclusions that for this first solicitation, bundled storage should be subject to inclusion in the PCIA mechanism (pursuant to a methodology for determining above market stranded costs yet to be determined); CAM authorization should be addressed in other dockets, as appropriate, but not here; and more generally that storage procurement costs should be allocated among customers consistent with equity principles and the function served by the energy storage resource.</p> <p>The Commission deferred resolution of cost recovery for storage resources that have a generation/distribution "dual use," an issued addressed by</p>	<ul style="list-style-type: none"> • D.14-10-045 at p. 46 (addressing PCIA treatment of bundled storage) • D.14-10-045 at p. 47 (concluding that CAM authorization is out of scope here but should be addressed in other venues where new storage resources proposed to address reliability issues is under consideration). • D.14-10-045 at p. 36 (discussing TURN's "dual use" proposal) and p. 48 (deferring the resolution of this issue until the utilities actually bring any such projects to the Commission for approval). 	<p>Verified</p>

TURN and other parties.		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN's positions overlapped to various degrees with several parties, including the Office of Ratepayer Advocates (ORA) and the Sierra Club, and to a much lesser extent, the California Energy Storage Alliance (CESA).		Verified
d. Intervenor's claim of non-duplication: TURN's efforts to coordinate with other parties with similar interests were effective at ensuring that TURN was able to minimize or avoid undue duplication in our participation in this proceeding. TURN primarily communicated with ORA and Sierra Club in an effort to avoid duplication, and TURN coordinated closely with Sierra Club on two issues of mutual interest: whether PG&E's dairy biogas resources should count towards the storage procurement targets and whether the 2014 solicitation results should be submitted via an advice letter or application. In a proceeding such as this where many stakeholder groups participate, some degree of duplication may be practically unavoidable.[1] TURN and other parties at times supported overlapping recommendations, but TURN's compensation in this proceeding should not be reduced for duplication of the showings of other parties. Moreover, in those instances, TURN sought to bolster support for the proposal by emphasizing distinct facts or authority to support the recommendation, to the extent practicable. Accordingly, TURN respectfully submits that the Commission should find that there was no undue duplication, as any duplication served to materially supplement, complement or contribute to the showing of another party and, therefore, is fully compensable under PU Code Section 1802.5. Hence, the Commission should not reduce TURN's award of compensation due to duplication.		Verified, but duplicative on two issues as noted above.

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion
1	<p><i>See, i.e.</i> D.96-08-040 (67 CPUC 2d 562, 575-576.X)("[B]ecause of the extraordinary level of participation required of both parties and intervenors throughout these proceedings, we find that a reduction in the amount awarded to intervenors based on duplication of effort is unwarranted. Section 1803(b) requires that the awarding of fees to intervenors "be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process." Each of the intervenor groups clearly has a stake in the process of restructuring California's electrical services industry and we are grateful for their participation in these proceedings. Moreover, we rely on them to continue their effective and efficient participation in our proceedings as we move forward with the many implementation tasks ahead. [footnote omitted][¶] In a broad, multi-issue proceeding such as this, we expect to see some duplication of contribution. This duplication does not diminish the value of that contribution to the Commission. In our view, to deduct from an award of reasonable fees in this case would not encourage the effective and efficient participation of all stakeholders in the spirit of § 1801.3(b).")</p>	

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>TURN's request for intervenor compensation seeks an award of approximately \$32,000 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the benefits to customers.</p> <p>TURN's advocacy reflected in D.14-10-045 addressed policy matters related to the Commission's Energy Storage Procurement program, rather than specific rates or disputes over particular dollar amounts. TURN specifically focused the IOUs' proposed procurement timelines, requirements, and definitions of eligible resources, as well as the procedural vehicle for the Commission's review of the 2014 solicitation results, in an effort to ensure appropriate Commission oversight of the new program and minimize the risk market dysfunction. TURN additionally addressed cost recovery and cost allocation to ensure that all residential ratepayers, as well as the subset of bundled residential customers, are asked to bear an equitable portion of the costs of the new program. TURN cannot easily identify precise monetary benefits to ratepayers from our work in this proceeding, given the nature of the issues presented.</p>	Verified

<p>However, in a proceeding as this, which was heavily dominated by utilities, energy storage industry parties, generators, and direct access (including CCA) interests, TURN represented the otherwise relatively under-represented interests of residential ratepayers. Despite the lack of easily quantifiable customer benefits, TURN submits that its positive impact on the Commission's policies regarding the Energy Storage Procurement program in this proceeding will afford the ratepayers of PG&E, SCE, and SDG&E significant benefits, as the establishment of energy policies has a direct and lasting impact on customer rates.</p> <p>As such, the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN's participation (or that of another intervenor). (<i>See, e.g.</i> D.13-12-027, p. 11 (awarding Sierra Club California intervenor compensation for energy storage policy work in R.10-12-007).)²</p> <p>For all of these reasons, the Commission should find that TURN's efforts have been productive.</p>	
<p>b. Reasonableness of hours and direct expenses claimed:</p> <p>This Request for Compensation includes 70 hours of TURN's attorney time and 37 hours of expert consultant time. TURN's efforts reflected herein resulted in numerous contributions to D.14-10-045, detailed above, and encompass the preparation of a six formal filings by TURN, plus active participation at the PHC and in the full-day workshop held on June 2, 2014.</p> <p><u>TURN Staff Hours</u></p> <p>TURN originally assigned this proceeding to staff attorney Nina Suetake, who left TURN at the beginning of April 2014. TURN Legal Director Tom Long covered the proceeding briefly until a new attorney could be assigned. TURN attorney Hayley Goodson took over in late April, quickly</p>	Verified

² See also D.99-12-005, pp. 6-7 (Compensation Decision in 1995 Storm Phase of PG&E GRC, A.97-12-020) and D.00-04-006, pp. 9-10 (Compensation Decision in Edison PBR Midterm Review, A.99-03-020) (recognizing the overall benefit of TURN's participation where that participation assisted the Commission in developing a record on which to assess the reasonableness of the utility's operations, and particularly its preparedness and performance in the future); D.00-05-022 (Compensation Decision in the Emergency Standards Proceeding) (awarding TURN \$92,000 in D.00-10-014 for our substantial contribution to the earlier decision, despite TURN's inability to assign a dollar value to the benefit of our participation in order to demonstrate "productivity." Interestingly, the Commission awarded compensation even though the emergency restoration standards may never come into play in the future, since they come into play only after a "major outage," which is defined as impacting more than 10% of a utility's customers. The contingent nature of the future standards did not cause the Commission to hesitate in awarding TURN compensation.).

got up to speed, and represented TURN for the remainder of the proceeding. TURN's timesheets reflect this very streamlined and efficient transition, necessitated by Ms. Suetake's departure. TURN submits that the number of hours for each TURN representative is reasonable.

TURN Consultant Hours

TURN also relied on outside expert consultants Kevin Woodruff of Woodruff Expert Services, and to a more limited extent, Bill Marcus of JBS Energy. Mr. Woodruff assisted TURN in R.10-12-007, the predecessor proceeding to the instant docket, and has extensive experience with energy procurement, renewable procurement, LTTP, and resource adequacy issues. As such, his input was critical in shaping TURN's positions in this proceeding. Mr. Marcus, who has decades of experience with cost allocation and cost recovery of utility investments, assisted TURN with those issues in this proceeding, with the exception of CAM-specific cost recovery issues, which fell within Mr. Woodruff's purview.

Summary

TURN submits that the Commission should find the hours requested here to be reasonable under the circumstances, and that TURN's showing supports that conclusion. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.

c. Allocation of hours by issue:

TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes:

Code	Description	Allocation of Time
PP	Work related to the IOUs' Energy Storage Procurement Plans and associated timelines.	6.1%
Def	Work related to the definition of "energy storage" for purposes of the Commission's new procurement program.	6.3%
CPUC Process	Work related to the Commission's process for reviewing the results of the first IOU solicitations.	2.1%
CA	Work related to cost allocation and recovery issues.	9.1%
#	Work related to multiple substantive issue areas that is not easily allocated to specific issues.	11.0%
WS	Work related to participation in the Commission's workshop in this proceeding.	13.4%

Verified

PD	This work was related to the Proposed Decision preceding D.14-10-045.	17.8%
GP	The work in this category includes activities associated with general participation in this proceeding.	23.2%
Comp	Intervenor Compensation: work preparing the Notice of Intent and Request for Compensation.	11.0%
TOTAL		100.0%

If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2014	53.00	\$355	Res. ALJ-303 (2.58%COLA) applied to the 2013 rate currently pending for Ms. Goodson in A.11-10-002 and A.12-11-009	\$18,815.00	51.1 ^[A]	\$355.00 ³	\$18,140.50
Thomas J. Long, TURN Attorney	2014	0.25	\$570	D.14-04-015 (adopting rate for 2013 of \$555), adjusted by the 2014 2.58% COLA per Res. ALJ-303	\$142.50	.24 ^[A]	\$570.00 ⁴	\$136.80
Nina Suetake, TURN Attorney	2014	5.25	\$330	D.14-04-015 (adopting rate for 2013 of \$320), adjusted by the 2014 2.58% COLA per Res. ALJ-303	\$1,732.50	5.06 ^[A]	\$330.00 ⁵	\$1,669.80
Kevin Woodruff, Woodruff Expert Services	2014	34.75	\$240	D.12-11-050	\$8,340.00	33.5 ^[A]	\$240.00 ⁶	\$8,040.00

³ Application of 2.58% cost of living adjustment to rate of \$345.00 per hour approved in D.15-05-019.

⁴ Application of 2.58% cost of living adjustment to rate of \$555.00 per hour approved in D.14-12-074.

⁵ Application of 2.58% cost of living adjustment to rate of \$320.00 per hour approved in D.14-12-077.

⁶ Approved in D.14-12-074.

Bill Marcus, JBS Energy, Inc.	2014	1.75	\$265	D.14-05-015	\$463.75	1.69 ^[A]	\$265.00 ⁷	\$447.85
Subtotal: \$29,493.75						Subtotal: \$28,434.95		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Hayley Goodson, TURN Attorney	2014	11.75	\$177.50	1/2 of requested hourly rate for 2014	\$2,085.63	11.75	\$177.50	\$2,085.63
Subtotal: \$2,085.63						Subtotal: \$3,520.58		
COSTS								
#	Item	Detail			Amount	Amount		
	Copies	Copies of filings and documents related to D.14-10-045			\$5.20	\$5.20		
	Postage	Mailing costs for filings related to D.14-10-045			\$7.14	\$7.14		
TOTAL REQUEST: \$31,591.72						TOTAL AWARD: \$30,532.92		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ⁸		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Hayley Goodson		December 2003		228535		No		
Nina Suetake		December 2004		234769		No		
Thomas J. Long		December 1986		124776		No		

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service

⁷ Approved in D.14-06-027.

⁸ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment 2	Timesheets for TURN's Attorney and Experts
Attachment 3	TURN Direct Expenses Associated with D.14-10-045
Attachment 4	TURN Hours Allocated by Issue
Comment 1	<p>2014 Hourly Rate for TURN Attorney Hayley Goodson</p> <p>For Ms. Goodson's work in 2014, TURN seeks an hourly rate of \$355. This rate reflects the application of the 2014 COLA adopted in Resolution ALJ-303 (2.58%) to the rate TURN has requested for Ms. Goodson's work in 2013, \$345, in requests for compensation currently pending in A.11-10-002 (SDG&E GRC Phase 2), A.12-11-009 (PG&E TY 2014 GRC), R.10-02-005 (Disconnections OIR), and in Phase II of A.11-05-017 et al. (CARE/ESAP). In calculating the 2014 rate for Ms. Goodson, TURN rounded the product of \$345 x 1.0258 to the nearest \$5 increment. A rate of \$355 is well within the range of \$320-\$375 established in Resolution ALJ-303 for an attorney with Ms. Goodson's experience. Ms. Goodson has represented TURN before this Commission since 2003.</p> <p>TURN presumes the Commission will resolve at least one of those four pending requests for compensation before the instant request. However, for the Commission's convenience, TURN repeats the showing we made in each of those earlier requests regarding TURN's request for a 2013 rate of \$345 for Ms. Goodson. In arriving at the 2013 rate of \$345, TURN adjusted Ms. Goodson's 2012 hourly rate of \$325 (adopted in D.13-08-022) by two factors. The first is the general 2% COLA authorized in Resolution ALJ-287 for 2013. The second is a 5% step increase, following Ms. Goodson's move to the 8-12 years experience tier in 2011. These two increases, rounded down, yield a \$345 hourly rate, well within the range of \$310-\$365 established in Resolution ALJ-287 for an attorney with Ms. Goodson's experience.</p>
Comment 2	<p>2014 Hourly Rate for TURN Attorney Nina Suetake</p> <p>For Ms. Suetake's work in 2014, TURN seeks an hourly rate of \$330. This rate reflects the application of the 2014 COLA adopted in Resolution ALJ-303 (2.58%) to the rate of \$320 adopted in D.14-05-015 for Ms. Suetake's work in 2013. In calculating the 2014 rate for Ms. Suetake, TURN rounded the product of \$320 x 1.0258 to the nearest \$5 increment.</p> <p>A rate of \$330 is well within the range of \$320-\$375 established in Resolution ALJ-303 for an attorney with Ms. Suetake's experience. Ms. Suetake was in her 10th year of representing TURN before this Commission at time of her departure.</p>
Comment 3	<p>2014 Hourly Rate for TURN Attorney Thomas J. Long</p> <p>For Mr. Long's work in 2014, TURN seeks an hourly rate of \$570. This rate reflects the application of the 2014 COLA adopted in Resolution ALJ-303 (2.58%) to the rate</p>

	<p>of \$555 adopted in D.14-05-015 for Mr. Long's work in 2013. In calculating the 2014 rate for Mr. Long, TURN rounded the product of \$555 x 1.0258 to the nearest \$5 increment.</p> <p>A rate of \$570 is at the top of the range of \$320-\$570 established in Resolution ALJ-303 for an attorney with 13+ years of experience. This rate is reasonable in light of Mr. Long's experience. Mr. Long has either practiced before or been employed by the Commission for more than 25 years. (See D.13-05-007, p. 6 (discussing the basis for the 2011 hourly rate adopted for Mr. Long, who at that point had "either practiced before, or been employed by the CPUC for 24 years.")).</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
A	Reduction of 50% for hours spent on "Work related to the IOUs' Energy Storage Procurement Plans and associated timelines" and reduction of 25% for hours spent on "Work related to the Commission's process for reviewing the results of the first IOU solicitations" resulting in a 3.58% reduction in hours.

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.14-10-045.
2. The requested hourly rates for The Utility Reform Network's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$30,532.92.

CONCLUSION OF LAW

The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$30,532.92.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 28, 2015, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1410045		
Proceeding(s):	A1402006, A1402007, and A1402009		
Author:	ALJ Kersten		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	12/15/14	\$31,591.72	\$30,532.92	N/A	Duplication

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Nina	Suetake	Attorney	The Utility Reform Network	\$330.00	2014	\$330.00
Thomas	Long	Attorney	The Utility Reform Network	\$570.00	2014	\$570.00
Kevin	Woodruff	Expert	The Utility Reform Network	\$240.00	2014	\$240.00
Hayley	Goodson	Attorney	The Utility Reform Network	\$355.00	2014	\$355.00
William	Marcus	Expert	The Utility Reform Network	\$265.00	2014	\$265.00

(END OF APPENDIX)